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Northern Sunrise Water Company Inc. and Southern Sunrise Water Company Inc.

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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF BELLA VISTA WATER CO, INC., NORTHERN SUNRISE WATER COMPANY INC., AND SOUTHERN SUNRISE WATER COMPANY INC.'S JOINT APPLICATION FOR APPROVAL OF AUTHORITY TO CONSOLIDATE OPERATIONS, AND FOR THE TRANSFER OF UTILITY ASSETS TO BELLA VISTA WATER CO., INC., PURSUANT TO ARIZONA REVISED STATUTES 40-285

DOCKET NO: W-02465A-09-0414

DOCKET NO. W-20453A-09-0414

DOCKET NO. W-20454A-09-0414

MOTION TO CONSOLIDATE

Bella Vista Water Co., Inc. ("BVWC"), Northern Sunrise Water Company, Inc., ("NSWC") and Southern Sunrise Water Company, Inc. ("SSWC") (collectively the "Joint Applicants") hereby file this Motion to Consolidate the above-captioned matter with the rate case applications filed by Bella Vista Water Co., Inc. ("BVWC") in Docket No. W-02465A-09-0411, Northern Sunrise Water Company Inc. ("NSWC") in Docket No. W-20453A-09-0412 and Southern Sunrise Water Company Inc. ("SSWC") in Docket No. W-20454A-09-0413.

BVWC, NSWC and SSWC are all affiliated companies owned by Algonquin Water Resources of America, Inc. ("Algonquin"). In addition to filing separate individual rate cases, BVWC, NSWC and SSWC have also filed a Joint Application to request that

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the Arizona Corporation Commission ("Commission") approve a consolidation of the companies' operations and their rates. By approving this Motion to Consolidate, the Commission can consider the Joint Applicants' request for rate consolidation, and consider the benefits of consolidation on all potentially affected water customers against the rate impact if all three rate structures otherwise remain separate. Notably, however, consolidation will not preclude a decision not to consolidate the three water providers as each rate case application contains all of the required testimony and supporting schedules upon which each individual company's rate can be set. Because consolidating the four applications will promote judicial economy and administrative efficiency, granting the Motion to Consolidate is in the public interest.

RELIEF REQUESTED

WHEREFORE, the Joint Applicants respectfully requests the following:

- 1. That the Commission proceed to consider and act upon this Motion as timely as possible by entering an Order approving the Motion, and
 - 2. Grant any other such relief as the Commission deems appropriate.

RESPECTFULLY SUBMITTED this 1st day of September, 2009.

FENNEMORE CRAIG, P.C.

Rv

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Attorneys for Bella Vista Water Co., Inc. Northern Sunrise Water Company Inc. and

Southern Sunrise Water Company Inc.

1	ORIGINAL and thirteen (13) copies
2	of the foregoing were filed this 1st day of September, 2009 to:
3	Docket Control
4	Arizona Corporation Commission 1200 W. Washington St. Phoenix, AZ 85007
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